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10 Attorneys for Defendant SCRIBD, INC.

11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 LARRY WILLIAMS,

14 Plaintiff,

15 vs.

16 SCRIBD, INC., a corporation, GalaxiaMia sued as
DOE 1; api_user_11797_malvik as DOE 2;
alukmanto as DOE 3; api_user_11797_NEBOJSAJE
17 as DOE 4; mikaj as Doe 5; Srikanthbnm sued as
DOE 6; api_user_11797_Sathis sued as DOE 7;
18 api_user_11797_tevado... sued as DOE 8;
api_user_11797_ingrid... sued as DOE 9; and DOES
19 10 to 40 are upload infringers to be named,

20 Defendants.

) CASE NO. 09-cv-1836-LAB-BGS
)

) **JOINT MOTION FOR DISMISSAL**
) **OF CLAIMS AGAINST**
) **DEFENDANT SCRIBD, INC.**

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1 Plaintiff Larry Williams (“Plaintiff”) and Defendant Scribd, Inc. (“Defendant” or
2 “Scribd”) respectfully submit this Joint Motion for Dismissal pursuant to Rule 41(a)(1) of the
3 Federal Rules of Civil Procedure. Plaintiff and Defendant hereby jointly move to dismiss with
4 prejudice all remaining claims in this action as to Defendant Scribd, based on a private,
5 confidential settlement agreement. The parties reached the settlement before Magistrate Judge
6 Bernard G. Skomal and consented to Judge Skomal’s retention of jurisdiction for the
7 enforcement of the settlement and all further action in this case. Accordingly, the parties
8 respectfully request that this Court dismiss Plaintiff’s remaining claims against Defendant Scribd
9 with prejudice *nunc pro tunc* to enforcement of the private settlement by Magistrate Judge
10 Skomal.

11
12 Respectfully submitted,

13 Dated: October 29, 2010

LAW OFFICES OF KURT W. HALLOCK

14 by s/Kurt W. Hallock/
15 Kurt W. Hallock
16 Attorney for Plaintiff
LARRY WILLIAMS

17
18 Dated: October 29, 2010

GORDON & REES LLP

19 by s/Richard P. Sybert/
20 Richard P. Sybert
21 Yuo-Fong C. Amato
22 Attorneys for Defendant
23 SCRIBD, INC.
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Signature Certification

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Richard P. Sybert, counsel of record for Defendant Scribd, Inc., and that I have obtained Mr. Sybert's authorization to affix his electronic signature to this document.

Dated: October 29, 2010

LAW OFFICES OF KURT W. HALLOCK

by s/Kurt W. Hallock/
Kurt W. Hallock
Attorney for Plaintiff
LARRY WILLIAMS

PROOF OF SERVICE

I, the undersigned, declare that I am over the age of eighteen years and not a party to this action. I am employed in the County of San Diego where this service occurred. My business address is 110 West "C" Street, Suite 1905, San Diego, California 92101. I hereby certify that on October 29, 2010, I electronically transmitted:

1) Joint Motion for Dismissal of Claims Against Defendant Scribd, Inc.; 2) [Proposed] Order Granting Joint Motion for Dismissal.

To the Clerk's Office pursuant to Electronic Case Filing Administrative Policies and Procedures using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the Following CM/ECF registrants who have consented to electronic service through the Court's transmission facilities:

Richard P. Sybert, e-mail: rsybert@gordonrees.com; Yuo-Fong C. Amato, e-mail: bamato@gordonrees.com; Attorneys for Defendant Scribd, Inc.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 29, 2010 at San Diego, CA.

____s/Kurt W. Hallock_____
Kurt W. Hallock

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